

**By ECF**

September 22, 2017

Honorable Denise L. Cote  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: United States v. Corey Brown  
S2 16 Cr. 559 (DLC)

Dear Judge Cote:

This letter is respectfully submitted in advance of the sentencing of Corey Brown, which is scheduled to occur before Your Honor on October 6, 2017. Letters such as this are usually submitted to supply the Court with information about the individual to be sentenced in an effort to persuade the sentencing judge to impose a less severe sentence. That is not the purpose of this letter.

On June 21, 2017, the jury found Mr. Brown guilty of Count Two of the indictment, Murder in Aid of Racketeering in violation of 18 U.S.C. § 1959(a)(1) and (2). This statute deprives Your Honor of all sentencing discretion and requires Your Honor to sentence Mr. Brown to life in prison. As the law stands today, Your Honor cannot make a sentencing distinction between individuals who actually take the life of another human and those who requests or aids and abets the taking of a life. There was a time when sentencing courts could and did distinguish between people who killed another person and those who requested or aided and abetted in the killing.

Your Honor has witnessed many changes in the law during your career. The enormous expansion of federal criminal prosecutions into what had historically been state criminal matters is just one example. The simple fact is that the law changes. There may come a time when the offenses Mr. Brown was convicted of will be deemed matters that should have been determined in Bronx County Supreme Court or the time may come

**Honorable Denise L. Cote**  
United States District Judge  
*United States v. Corey Brown*  
S2 16 Cr. 559 (DLC)  
September 22, 2017  
Page 2

when the law recognizes different levels of culpability for people who take the life of another and those who encourage or assist in that killing in some manner.

The day we speak of has not come and it may never come, but there could come a day when the law has changed and Mr. Brown appears before Your Honor for re-sentencing. If on that day Your Honor has the discretion to impose a sentence of less than life, this letter is respectfully submitted to inform Your Honor that Corey Brown is an intelligent but unschooled man with people who love him.

Attached to this submission, as Exhibit A, is a letter from Bahdria Brown, Corey Brown's wife and the mother of his 3 year old and 1 year old daughters, Kori and Cali. Mrs. Brown wrote to tell Your Honor that Corey Brown is the kind of man who stands up to bullies and defends strangers who need protection. He is the kind of man who thought about giving his clothing to the less fortunate, even on the day he self-surrendered on this case. He is the kind of man who gladly accepts the non-traditional role of being a stay-at-home dad. Mrs. Brown recognizes that Corey Brown has the potential to be a lawyer like his half brother who was raised by their biological father, a man Corey believed had died, an observation shared by his defense counsel. Mrs. Brown's children will grow up without a father. We can only hope that their mother's family, with their tradition of hard work and public service, will help them grow up to be productive citizens.

Raymond Toomer is Corey's biological father. A letter from Mr. Toomer is attached as Exhibit B. Mr. Toomer did not know of Corey's existence until three years ago. As he notes in his letter, it is difficult to build a father-son relationship between adults. To the credit of both Mr. Toomer and Corey, they tried to build such a relationship. Mr. Toomer attended a number of events hosted by Corey or one of Corey's friends. Mr. Toomer heard people speaking positively of Corey and he observed Corey "having a positive effect on several of the younger men in his company." Mr. Toomer readily expresses his anger at Corey's mother for denying him the opportunity to help raise Corey and for denying Corey the opportunity to have a positive male role model in his life.

Joanne Gowie is Corey's mother. A letter from Ms. Gowie is attached as Exhibit C. Life has not been kind to Ms. Gowie. She has struggled with many issues. Whatever

good or bad can be said about Ms. Gowie, the undeniable fact about Ms. Gowie is that she loves her son.

Tiffany Singh is Corey Brown's cousin but, as her letter (Exhibit D) indicates, she is more like Corey's sister. Ms. Singh describes how she was abandoned by her parents and raised with Corey by their great grandparents and her great aunt. Ms. Singh's letter does not express the resentment one might expect but rather she describes growing up in a household with a loving extended family. A family that included Corey Brown who, in addition to being her surrogate brother, was her dance partner at many family celebrations. Ms. Singh describes how Corey grew up: a mother who "was just there," Corey's father whom she and Corey did not meet until they were adults, and how important Corey's brother, Andre, was to them as they were growing up.

Ms. Singh describes how Corey includes people in family events and cookouts. Corey included one of Ms. Singh's ex-boyfriends in family events because he was "family." Based on our experience with Corey Brown, when Ms. Singh says that Your Honor would be invited to a Brown family event, we believe her.

A letter from Donald Hamilton is attached as Exhibit E. Mr. Hamilton met Corey Brown in a Bronx youth basketball league. Mr. Hamilton talks about how Corey encouraged him to stay in school and avoid gangs. Mr. Hamilton is the beneficiary of Corey Brown's empathy and concern for people he knows, a concern and empathy that he could share with others should he be permitted to return to the community.

Exhibit F is a letter from Corey's cousin, Valerie Francis-Mallette. Ms. Francis-Mallette is a retired New York City Probation Officer. Ms. Francis-Mallette wrote to talk about Corey's love for his family, both his extended family and in particular, Corey's love and pride in his wife and children. That ability to be part of a family, to share with others, is a reason to believe that Corey Brown has the potential to be a constructive member of his family should he ever be permitted to rejoin it.

Corey Brown is a member of a large family that loves him. Unless there is a change in the law at some point in the future, Corey will never be able to attend another family function or cookout. We respectfully request that Your Honor recommend to the

**Honorable Denise L. Cote**  
United States District Judge  
*United States v. Corey Brown*  
S2 16 Cr. 559 (DLC)  
September 22, 2017  
Page 4

Bureau of Prisons that Corey Brown be designated to the Federal Correctional Complex at Allenwood so that he can remain in contact with his children and other family members.

Respectfully Submitted,

/s/Andrew Patel  
Andrew G. Patel  
Jean Barrett  
Benjamin Silverman  
*Counsel for Corey Brown*

cc: All counsel by ECF

# **Exhibit A**

Bahdria Brown

██████████  
Bronx, N.Y., 10475

August 22, 2017

The Honorable Denise L. Cote  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, N.Y. 10007

Re: United States v. Corey Brown  
16 Cr. 599 (DLC)

Dear Judge Cote:

My name is Bahdria Brown. I am Corey Browns' wife. We've been married for seven (7) years. We have two (2) daughters █████ who is 3 years old and █████ who is 11 months old. I am a NYC Correction Officer. I've been on the job for over eighteen (18) years. I'd like to tell you a little bit about my life. My mother is a NYPD civilian for over thirty (30) years. My grandmother is a retired MTA worker. Also over (30) years. I later became a City Worker. My oldest sister is a Nurses Assistant at Metropolitan Hospital, also a City Worker. I look at Corey, his mother. I've never known her to have a real job. I thank the Lord everyday that she was not my mother, just to be frank. I believe, to understand the present you need to understand the past. Some people have horrible parents and grow up to be great. I know a lot of people but none who fits this category, only in books. I didn't have a father. He left for no real reason when I was fifteen (15) months old. I've met him twice. Corey didn't discover who is real father was until we were married. His mother lied to him everyday, told him his father had died when Corey was three (3) years old. One of Corey's brothers, his father's son, is a Lawyer. You can't help but wonder who Corey would've become had his father been apart of his life.

This is the best way to describe who Corey is.

My Stepfather told me a story about how he was on a Bronx bound D train coming home from work a few months ago and there was a man sitting in his section on the train. Two (2) ladies came and also sat in the same section of the train and the man became very irate for no sane reason. He began yelling and cursing at the women. He stood up towering over these women yelling, scaring them beyond belief and then he spat at one of the ladies directly in her face. My stepfather could not believe this man was attacking these women. They were scared and in shock. They didn't say or do anything. A man from the other side of the train approached this irate man and asked him what is your problem why are you doing this? Another man also approached the situation and assisted the good samaritan in beating the hell out of this irate man. The irate man exited the train at the next stop. Everyone went on with there lives. The

women were very grateful to the good samaritans. As my stepfather was telling me this story I was so grateful Corey was not on that train. Unlike my stepfather, Corey wouldn't have just sat there and allowed that man to berate those women he would have also done something. I love that about my husband. That he is a Man of integrity, compassion and heart. He has never been a coward. So in the event that something not so nice is about to happen, you and I could only pray to be in close proximity to a soul like his. The soul of a warrior.

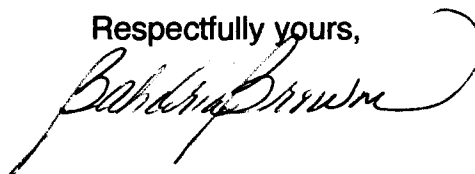
On August 17, 2016 Corey came home, as I knew he would. We talked, we cried. As he was leaving to turn his self in he asked if I had seen his converse sneakers. I said Corey this is not the time for a wardrobe change. He said I know that but these sneakers are new and I could give them to someone. I couldn't believe that at a time like this he was thinking of others.

Corey had a friend from Soundview, Jason, who he went to middle school with who became a drug addict. And every time Corey was getting rid of clothes he would put them in a bag and go looking for Jason.

I pray you receive this letter and that it explains to you who this man truly is. A man that I have known since I was ten (10) years old. We've lost contact in our teenage years but this is the core of who Corey has always been. I saw the potential in Corey. Corey worked every year until he got laid off in 2014 and became a stay at home Dad. And I was happy with that arrangement. I had been living in my same apartment for 17 years and was able to take care of my family with my salary.

I've lost my best friend. But I would still chose Corey if I had to do it all again.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Robert Brown", with a large, sweeping flourish extending to the right.

# **Exhibit B**



Raymond Toomer

Bronx, NY 10467

August 29, 2017

The Honorable Denise L. Cote  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

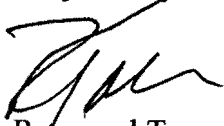
Re: United States V. Corey Brown  
16 Cr. 599 (DLCL)

Dear Judge Cote,

My name is Raymond Toomer and I am the biological father of Corey Brown. First and foremost may I inform you that I just met Corey 3 years ago? I am an addiction counselor by profession who has had the privilege of meeting Corey when I did. Initially I was very annoyed that I had son and was not aware of his existence. I am highly concerned about not only Corey, but, the two little girls that will be without a dad. I realized that I had a son who was highly mannerable, honest and seem to be very happy he has met his biological dad.

I really haven't had the opportunity to get to know Corey as a son, because of him being an adult, it was somewhat difficult for us to connect as father and son. I have been invited to several formal occasions where Corey was either the host or one of his friends was hosting. I saw that he was a caring young man with the potential to succeed in life as a productive member of society. I observed Corey having a positive effect on several of the younger men in his company. Everyone had something positive to say about Corey. Corey was raised without a male role model in his life, which is paramount for a son not being raised at all. So Corey was defeated in life even before he was born, by a woman who didn't tell him who his biological father was before he became an adult. So if you can find it in your heart to forgive someone who was left behind at birth, as Corey has, please do, he deserves it!

Respectfully Yours,



Raymond Toomer

# **Exhibit C**

Joanne Gowie

██████████ Bridgeport, CT ██████████

08/24/17

The Honorable Denise L. Cole

United States District Judge

United States Courthouse

500 Pearl Street

New York, NY 10007

Re: United States v. Corey Brown

16 Cr. 599 (DLC)

Dear Judge Cote:

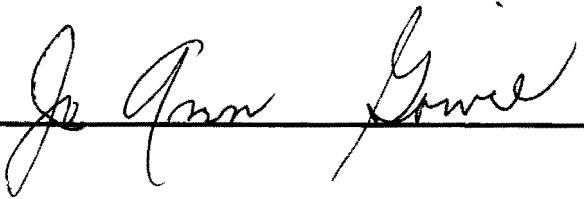
My name is Joanne Gowie, I am the mother of Corey Brown. I have been retired for some time now, due to health issues, so my days consist of reading, watching television programs, doing online shopping, staying in touch with family & friends via Facebook, occasionally making trips back to New York to see my old friends & family members, and most importantly spending quality time with my loving husband. I am the mother of 3 children, three wonderful boys to be exact, and I'm very much involved in all my kid's lives and love to be around my precious grandchildren.

I gave birth to my wonderful son, Corey Brown, in March of 1979. Although, Corey is my middle child he was never neglected like folklore would suggest, as I love my kids all the same

and equally gave them unconditional love and attention. I taught Corey as well as my other two children the value of empathy, respect, and manners. My kids grew up in a loving household where they saw me and my husband treat each other in a respectable and affectionate manner. I did for them the best that I could, made sure they were feed, put clothes on their back, supported them in any way possible, attended their childhood performances & sports games, educated them on the dos & don'ts of life, and constantly repeated to them time & time again to follow a straight path, and be a leader not a follower. Somewhere along the way, Corey made some mistakes like we all do, but after he served some time in prison and got married to his lovely wife, Bahdria, and made beautiful children with her, he was a changed man. Corey's life changed for the better since becoming a husband and a father. As a mom, I notice the difference in my son and I can tell you Corey is a much better person today than who he was before going into jail. People mature in time, and that's exactly what my son, Corey Brown, did. He evolved into the man I feel God always destined him to be. I would hate to see my grandkids suffer by not having their dad around, because having a strong family was at the core of my upbringing. I grew up in a time where adults waited until marriage to have kids, relationships lasted for 20 years or so, and fathers/husbands were very much so involved in the lives of their kids and provided for the household. Corey is an admirable father and an even better person, and I'm not just saying this because he's my son, but because I saw front and center his growth as a person and how well he takes care of his wife and his kids. I love my son dearly and I just want the best for him. I know within my heart I raised a great person who this world would love and appreciate. He's the family comedian and peace maker, always being there to patch up family disputes & getting family members who weren't getting along to speak to each other again.

Corey is a valuable member of the Payne, Mills, Brown, & Gowie family, and we just want to continue experiencing the great vibes and feeling we get from being around him.

***Respectfully yours,***

A handwritten signature in cursive script, reading "Jo Ann Gowie", is written over a solid horizontal line.

# **Exhibit D**

Tiffany Singh

[REDACTED]  
[REDACTED]  
Bronx, New York, 10475

August 29, 2017

The Honorable Denise L. Cote  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: United States V. Corey Brown  
16 CR. 599 (DLC)

Dear Judge Cote:

My name is Tiffany Singh and I am Corey Brown's cousin. I am married, a graduate of Iona College and have two (2) children all boys ages from 23 years old to 4 years old. My oldest son has graduated from Castleton University in Vermont recently, and the youngest will start kindergarten in September. I have been working in the HVAC Field for over 20 years as an Operations Manager

As mentioned, Corey Brown is my cousin but he is more like my brother. We were raised in the same household. My parents left myself and my sister behind when I was three (3) years in care of my great grandparents and my great aunt. This was not the typical case or story you hear about in the urban communities. My father was a Chemical Engineer, my mother worked at a chemical plant. When the relationship was over neither wanted my sister and I. They left us and never looked back. As a young child, you would think I would be bothered. Actually, I had one of the best lives ever. Corey, and his two brothers, along with several other cousins all dwelled in one household. We all attended Catholic school, went to summer camp or spent time with our family in Barbados. All of this was made possible by my great grandparents and my great aunt who worked hard and showed us unconditional love.

Corey's mother was in the household but I won't say she is someone he looked up to or supported in anyway. She was just there. As for Corey's father, he met him three years after thinking someone else was his father for years. I can't say if it affected him in anyway. Although we have had plenty of lengthy talks, we were in the same boat, parents that just went on with their lives without showing any type of affection, responsibility or care in the world. The only mother and father figure that I feel was nurturing to Corey was our great grandparents, our great aunt Mary and I cannot forget his older brother Andre. At a very young age, Andre made sure he watched over Corey. He helped learn how to ride a bike, play basketball and provided support with homework. By the time Corey became a teenager, our great grandparents have passed and his older brother Andre died in a motorcycle accident.

Corey is the true definition of a “social butterfly.” He has a likeable personality. Honestly, Corey gets it from our great grandparents. They will feed and help the whole neighborhood if they could and Corey is just like them. He is the type of guy that will strike a conversation with anyone and will always make sure to let you know when our family was having a get together. And yes, you would be invited.

When Corey was a young, one of his friend’s mother died. His friend lived in the neighborhood projects and had nowhere to go. Corey told my grandparents and he moved in with us for a short while. This friend was not one of his best friends but Corey wanted to help. We often had quite a few people with issues living with us thanks to Corey.

Years ago, I broke up with a boyfriend that I was dating for quite some time, Corey kept in touch with him because he knew he did not have much family. Corey invited him to all holiday events and barbecues. Although this did not sit well with me, Corey always reminded me that he is family. This “ex-boyfriend” is still to this day a part of our family because of Corey.

My oldest son decided after his sophomore year that he wanted to explore life and leave college. His father and I could not get it through his thick head that he was not leaving. As soon as he returned from college for the summer, Corey took him to several job fairs and made him sign up for NYC Fire Department, NYC Sanitation Department, and NY/NJ Port Authority Police just to name a few. Whatever the conversation they had, Corey was not allowing him to leave school. My son return back to school in the fall. He graduated from college in the spring of 2017. He just finished the physical for NY/NJ Port Authority Police, he also will be taking the NY Fire Department test in September and is currently working at the US Open. I’m not going to say all of this was made possible by Corey, however I would say he has contributed to my son’s future.

One of the biggest thing in our household was dancing and singing. I cannot sing at all and neither could Corey however we were the backup dancers! You could not tell us nothing. Corey knew all the latest Michael Jackson moves and I was Janet. We took these moves so serious that we were constantly competing against others. This went on for years. When I think about this now, I laugh. One of the latest dance off took place two (2) years ago. My Aunt Tiny passed away due to Alzheimer disease. After the repass, we all headed to my aunt’s house and my aunt’s husband put some music on in the backyard. It was on! All of our cousins started battling Corey and I. Nothing has changed except two (2) years ago I was 43 years old and I could not get up as quick. Corey did not miss a Beat!

No matter how many arguments we got into Corey will always follow up within a couple hours just to let me know he loves me. And then we will just go on. There were never any hard feelings. I hope this letter sheds some light on who is “Corey Brown”, my experience with him and the relationship with others as well.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Jeffrey Smith". The signature is fluid and cursive, with a large, stylized 'S' at the end.



# **Exhibit E**

Donald Hamilton

██████████t Bridgeport, CT ██████████

08/18/17

The Honorable Denise L. Cole

United States District Judge

United States Courthouse

500 Pearl Street

New York, NY 10007

Re: United States v. Corey Brown

16 Cr. 599 (DLC)

Dear Judge Cote:

My name is Donald Hamilton, I am a great of friend of Corey Brown. I'm going into my junior year of college, at Mercy College, and I work as a security officer outside of school. I also do volunteer work within my community, helping underprivileged kids with their school work, conducting extracurricular activities with them, and counseling them on the importance of a good education, staying in school, listening to their parents, respecting the authorities, obeying the law, staying the right path, and having love for everybody no matter their race, gender, or sexual orientation.

I have been blessed to know Corey Brown for 8 years now. Corey Brown has been a big influence on my life, since I met him in a youth basketball league in the Bronx. I have made

many friendships while playing in sports, but none has stood out like the one me and Corey shares. Corey is a very down to earth person with a big heart, very kind, encouraging, positive, loyal, honest, polite, welcoming, humble, appreciative, respectful, and compassionate. Corey Brown's passion for helping others is what led me to be the community involved person I am today, as he taught me the importance of helping others is the least we all can do as citizens to fulfil our earthly purpose. When I was tempted at times to cut school some days Corey would always advise me to go to class, take school seriously, and do what I have to make a better life for myself and my family. When I wanted to be young and wild, Corey always stayed in my ears about sticking to one woman and settling down. He would always tell me all that's out there in the world is a bunch of diseases, and it doesn't have any preferences for who it affects. Corey is the most peaceful person I know, he has always been an anti-violent type of person. I believe his only reason for joining a gang was for popularity, because gang members are the type of guys most of the girls from our area want to talk to. Corey just wanted a better chance of coming across the right girl by joining a gang. I don't think it was the best decision to do, but no one is perfect. We all make mistakes somewhere along the way in life. Corey did come across his eventual wife to be, got married and had two beautiful children with her. Corey has always served as a big brother/mentor to me by always telling me to stay the right path, take school seriously, stick to one woman and settle down, do for the community, and etc. He's a really wonderful human being who really cares about his community and his loved ones. Corey's influence on me has led me to be near completion of my Bachelor's degree in Business Administration, on the verge of being married myself, and being involved in my community. Corey Brown is one in a million, and I one day hope to be the great family man he is.

***Respectfully yours,***

*Donald Hamilton*

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# **Exhibit F**

Valarie Francis-Mallette

[REDACTED]

[REDACTED]

Harrisburg, Pa 17110

August 26, 2017

The Honorable Denise L. Cote  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: United States v. Corey Brown  
16 Cr. 599 (DLC)

Dear Judge Cote:

I am writing this letter on behalf of Corey Brown who will appear before you on October 6, 2017 for sentencing.

I am Corey's cousin. I have known Corey for over thirty-eight years. I am a mother of three and a grandmother of five. I am a retiree from the City of New York with over thirty years of service with my last position at the Department of Probation. In March 2017, I resigned as a part-time Educational Paraprofessional with the Capital Area Immediate Unit working with special needs children in the Harrisburg area, approximately ten years, for medical reasons. In addition, I am an active member in my church, Greater Zion Missionary Baptist Church, Harrisburg, which I serve on a ministry.

One of the main qualities of Corey is his love for family. Wherever and whenever he could be an assistant to any member, he was a willing participant. With that love comes, Corey, a person who enjoys being around his family and is delighted to participate in all family activities. During my visits to New York, Corey brought joy to me at each encounter. He would stop by and we would watch movies, he will tell jokes, laugh and reminiscence about his great grandparents, especially his grandmother and find humor in their sayings as well as their actions. Corey was the second little brother to my son and daughters.

I saw a change in Corey when I was introduced to his wife and child. I admired Corey's devotion shown to his family at the family cookout. Corey walked around like a proud peacock introducing his wife and his daughter to each family member. The smile on his face was priceless; happiness surrounded his being and the realization of being a husband and father uplifted his maturity. There was a positive alteration in my cousin's life.

The last conversation I had with him was at the funeral and the repast of our Aunt. About thirty family members were out in the backyard doing what we do best; having a great time and retelling old stories.

Corey is the great entertainer. He acted out different stories adding much more details which had us flowing with tears of laughter. Corey with his pranks big and small; all done in a good nature, ultimately harmless ways brought us from sadness to joy. He had the wisdom to see that the environment was getting too serious so with him laughter cures all.

Besides being my cousin, Corey is my godson and a member of a strong knit supportive family. Corey is friendly, well- mannered and has always shown me respect. I love Corey and care for his well-being. Therefore, I pray that you will grant him mercy and leniency.

Thank you for taking the time to read this letter.

Sincerely,

A handwritten signature in cursive script that reads "Valarie Francis-Mallette". The signature is written in black ink and is positioned above the printed name.

Valarie Francis-Mallette